

TAB 20

Highly Confidential - Subject to Further Confidentiality Review

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION
4 - - -
5

6 IN RE: NATIONAL : HON. DAN A.
7 PRESCRIPTION OPIATE : POLSTER
8 LITIGATION :
9 :
10 APPLIES TO ALL CASES : NO.
11 : 1:17-MD-2804
12 :
13

14 - HIGHLY CONFIDENTIAL -
15

16 SUBJECT TO FURTHER CONFIDENTIALITY REVIEW
17

18 VOLUME I
19 - - -
20

21 April 17, 2019
22 - - -
23

24 Videotaped deposition of
25 THOMAS PREVOZNIK, taken pursuant to
26 notice, was held at the law offices of
27 Williams & Connolly, 725 12th Street,
28 Washington, D.C., beginning at 9:11 a.m.,
29 on the above date, before Michelle L.
30 Gray, a Registered Professional Reporter,
31 Certified Shorthand Reporter, Certified
32 Realtime Reporter, and Notary Public.
33 - - -
34

35 GOLKOW LITIGATION SERVICES
36 877.370.3377 ph | 917.591.5672 fax
37 deps@golkow.com
38

Highly Confidential - Subject to Further Confidentiality Review

1 we've already determined that prior to
2 December of 2007, you're not aware of the
3 DEA saying to the industry, no more
4 excessive purchase reports, right?

5 MR. FINKELSTEIN: Object to
6 the characterization of the
7 witness's testimony.

8 THE WITNESS: I would say
9 if -- we would take any data that
10 anybody wants to give us, so...

11 BY MS. MAINIGI:

12 Q. That didn't answer my
13 question.

14 A. I'm sorry.

15 MR. FINKELSTEIN: Objection.
16 Argumentative.

17 BY MS. MAINIGI:

18 Q. We've already established
19 that prior to 2007 you're not aware of
20 the DEA saying, no more excessive
21 purchase reports, right?

22 A. Right. Correct.

23 MR. FINKELSTEIN: Let me
24 object.

Highly Confidential - Subject to Further Confidentiality Review

1 THE WITNESS: Sorry.

2 MR. FINKELSTEIN: Object to
3 the characterization. You can
4 answer.

5 THE WITNESS: Correct.

6 BY MS. MAINIGI:

7 Q. And the DEA was aware that
8 there were, in fact, being routinely
9 submitted by distributors excessive
10 purchase reports on a regular basis,
11 right?

12 A. We were aware.

13 Q. And you were also aware that
14 there were employees of the DEA that had,
15 in fact, blessed certain excessive
16 purchase reporting systems, right?

17 MR. FINKELSTEIN: Objection.

18 MR. FARRELL: Objection.

19 Foundation.

20 THE WITNESS: I'm not aware
21 of employees --

22 BY MS. MAINIGI:

23 Q. This isn't about you, this
24 is the DEA.

Highly Confidential - Subject to Further Confidentiality Review

1 Was the DEA aware that
2 certain employees had, in fact, blessed
3 the excessive purchase reporting systems?

4 MR. FARRELL: Objection.
5 Foundation.

6 THE WITNESS: I don't know
7 which employees you're speaking
8 of.

9 BY MS. MAINIGI:

10 Q. Just employees. Is -- is it
11 fair to say that the DEA did, in the late
12 '90s and early aughts, from time to time
13 review the reporting systems of
14 distributors and essentially give them a
15 yay or nay as to whether they thought
16 that the reporting system was suspicious?

17 MR. FARRELL: Objection.
18 Foundation.

19 MR. FINKELSTEIN: Objection.
20 Vague.

21 THE WITNESS: You lost me on
22 the last part.

23 BY MS. MAINIGI:

24 Q. Okay. Let me start over.